

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DINO ANTOLINI,

Plaintiff,

-against-

AMY MCCLOSKEY, THERESA LAURENT, DIMUR  
ENTERPRISES INC., EDDIE C K CHUNG and C&S  
MILLENIUM REAL ESTATE LLC,

Defendants.

Case No.: 1:19-cv-9038

REQUEST FOR  
CLERK' S CERTIFICATE  
OF DEFAULT

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TO: RUBY J. KRAJICK  
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Please enter the default of defendant Eddie C K Chung for failure to plead or otherwise  
defend this action as fully appears from the court file herein and from the attached affirmation of

Stuart H. Finkelstein, Esq.

Dated: Syosset, New York  
October 14, 2020

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DINO ANTOLINI,

Plaintiff,

Case No. 1:19-cv-9038

-against-

AFFIRMATION IN SUPPORT  
OF REQUEST FOR ENTRY  
OF DEFAULT

AMY MCCLOSKEY, THERESA LAURENT  
DIMUR ENTERPRISES INC., EDDIE C K CHUNG  
and C&S MILLENIUM REAL ESTATE LLC,

Defendants.

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Stuart H. Finkelstein, Esq., an attorney duly admitted to the Southern District Court of New York, states as follows:

1. I am the attorney for Plaintiff in the above captioned action.
2. This action was commenced pursuant to Title III of the Americans with Disabilities Act 42 U.S.C. § 12181, et seq..
3. Jurisdiction of the subject matter of this action is based on 28 U.S.C. Sections 1331 and 1343.
4. This Court has personal jurisdiction over the defendant and, to the best of my knowledge, the defendant is not an infant or incompetent or in the military service of the United States.
5. As demonstrated by the affidavit of service filed herein, Eddie C K Chung was served on October 1, 2019, answer due October 23, 2019 to otherwise move with respect to the Complaint and the time to do so has expired. [DE 13]
6. The defendant has not answered or otherwise moved with respect to the Complaint and the time to do so has not been extended.
7. This action seeks declaratory and injunctive relief to compel the defendants to bring the defendants' property into compliance with the ADA, compensatory damages to Plaintiff,

pursuant to N.Y. Exec. Law§ 297(9) and N.Y. Civ. Rights section 40-d, punitive damages and reasonable attorney's fees, expert's fees and costs, pursuant to 42 U.S.C. § 12205.

**WHEREFORE**, Plaintiff requests that the default of defendant Eddie C K Chung be noted and a certificate of default ~~issued~~.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief, that the relief claimed is justly due to Plaintiff, and that no part thereof has been satisfied.

Dated: Syosset, New York  
October 14, 2020

Respectfully submitted,

By: S/  
Stuart H. Finkelstein, Esq.  
Finkelstein Law Group  
Attorney for Plaintiff  
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